

Cumulative Impacts Assessment Issues, 2011 Priorities

1. **Regulatory amendments for permanent T/I rules: Cumulative Effects (14 CCR 916.9 (d)).** *Objective/Status:* FPC to begin work following completion of T/I road rules. Estimated beginning in 2012.
2. **Regulatory amendments for permanent T/I rules: Impaired Waterbodies/TMDLs. (14 CCR 916.12)** *Objective/Status:* FPC to begin work following completion of T/I road rules. Estimated beginning in 2012.
3. **Regulatory amendments for permanent T/I rules: Monitoring. (14 CCR 916.11)** *Objective/Status:* FPC to begin work following completion of T/I road rules. Estimated beginning in 2012.

14 CCR § 912.9, Board of Forestry Technical Rule Addendum No. 2:

1. Categories need to be expanded to include climate change and effect on fire threat from the proposed harvest. **(To Policy Committee)**
2. Maps need to show all the past, currently proposed, and likely future THPs layered into one map. **(Phase III of ASP review)**
3. Biological assessment areas and proportional mitigations, expansion of consideration of non-conifer resource. **(Phase III of ASP review)**
4. Is mitigation required proportional to the impacts? E.g., small harvest operations required to utilize the same mitigations as industrial operations. **(Phase III of ASP review)**
5. Consider adding adjacent watersheds for evaluating past, present and future projects. **(Phase III of ASP review)**
6. Assessment of impacts made project by project, need landscape approach. California State Wildlife Action Plan not being adhered to: "Using the best-available science, extent, pattern, and pace for timber-harvest in a forest watershed". <http://www.dfg.ca.gov/wildlife/WAP/>. **(Phase III of ASP review)**
7. CEQA case law states that where the environmental baseline demonstrates existing significant impacts, this heightens, rather than reduces, the scrutiny that must be applied in the resulting cumulative impact assessment. The Board of Forestry, Cal Fire, DFG, Water Boards, and the scientific community should begin to address CWEs by developing detailed guidance documents on the subject.
8. Create a workplan within 6 months and begin Implementation by 1 September 2011 of a full stakeholder process to develop a agreed-upon and protective method of cumulative impacts analysis